

SPL Process ER/DL Meeting Meeting Minutes Nov 18, 2015 Q&A with FDA on Lot Distribution Reporting

Chair of today's meeting: Herb O'Brien

Teleconference information:

USA Toll-Free: 866-213-2145

USA Paid/International: 609-454-9913

Access code: 273 8216

Link to the SPL wiki:

<http://spl-work-group.wikispaces.com/share/view/51351516>

Agenda:

FDA Presenters:

Michael Fauntleroy: CBER electronic submissions manager

Lonnie Smith: SPL project manager

Lilly:

1. "What data is intended to be collected related to CDER Lot Distribution Reporting"-Lilly

- a. Bulk Lot: Please confirm what is meant by "bulk lot" to be reported in the LDR data.

[Response from CDER Office of Policy for Pharmaceutical Quality \(Carolyn Cochran\): Bulk lot is intended to be the bulk drug product lot used for filling.](#)

- b. Bulk lot manufacturer --- Please confirm which establishment should be reported –

[Based on response above from CDER Q: Manufacturer of drug product.](#)

GSK

Details we have learned, but which are not publicly documented include:

- Sponsors should request a pre-assigned STN number for submissions to CBER in order for the submission to be automatically routed during ESG transmission.
 - [Standard policy at CBER. It helps to get a second level for routing.](#)
- 356H form--if the submission type Other is used, the eCTD will not be automatically processed.

Michael Fauntleroy:

Correct. Consistent for all electronic submissions.

Submission type should be Product Correspondence – per guidance.

- How to submit through the gateway:
 - CBER ESG menu item: SPL_LDD for CBER or
 - CBER ESG menu item: eCTD

Michael Fauntleroy: [standard instructions](#)

- How to include in the eCTD:
 - For CDER submissions, create a SPL subfolder in the eCTD folder in the eCTD output (\m3\32-body-data\32r-reg-info\spl)

Michael Fauntleroy: This is standard eCTD guidance across both centers.

CBER Specific questions

2. At what point does the SPL validation occur and how quickly should we expect to receive the second acknowledgement?

Michael Fauntleroy:

Validation occurs as follows:

- Load folder in gateway
- Folder is received. Copy is made and sent to elist validation.
- Validated and sent from OC to sponsor
- Original is sent to appropriate place in CBER.
- If resubmit, use a new sequence number.

Response should be received within 4 hours.

3. If the SPL is valid, when is it loaded into CBER's eLDD database? Is this an automated process or does it require manual intervention from the Office of Biostatistics and Epidemiology?

Michael Fauntleroy: [manual process. 1-3 days.](#)

[Notification from elist \(pragmatic validation tool\) is within 4 hours. Look for this.](#)

4. If the SPL is invalid, does the process stop or is manual intervention triggered. We've had submissions where we had SPL validation error messages, but then received confirmation e-mails from LDDdistribution@fda.hhs.gov that the reports had been loaded into the eLDD database.

Michael Fauntleroy: Automated process.

Manual process is when you send a question. Please send in Core ID.

5. How does the sponsor know when follow up action is required?

Michael Fauntleroy: If you receive a second acknowledgement with errors noted.

Recently have received a lot of incorrect errors from the eList system related to how it was packaged This is an erroneous error that is being fixed.

Do sponsors have to resubmit? (ie since the error was sent). They will need to contact FDA so that it will be fixed.

CDER submissions should contact Michael at michael.fauntleroy@fda.hhs.gov

CDER submissions should contact ishani.chowdhury@fda.hhs.gov

6. How quickly should the sponsor expect to get confirmation of data load from LDDdistribution@fda.hhs.gov?

Michael Fauntleroy: From 1 to 3 days.

7. Is there assurance that the validation criteria used by the publicly available Pragmatic tool identical to what is used internally at the FDA?

Michael Fauntleroy: No. Because Pragmatic does not have all the proprietary internal information within FDA.

CDER Specific Questions

8. Is the SPL file validated when sent to CDER?

Lonnie Smith: refer to LDD submissions group. The submissions are sent to the center, not to the OC portal.

9. Should we expect to see the same second acknowledgement as with CBER submission?

Lonnie Smith: refer to LDD submissions group.

10. Does CDER have an equivalent LDD database to CBER? If so, will sponsors receive notification of data load as we do on the CBER side.

Lonnie Smith: refer to LDD submissions group.

Vendor Questions

11. Why does the LOT Distribution Information in the FDA stylesheet duplicate?

Lonnie Smith: The stylesheet has to be corrected. This will be corrected the next time the stylesheet is implemented.

12. Some KITs do not have NDC Codes applied to the parts (there is only an NDC code on the overall kit). However, only a part of the kit might be tracked for Lot Distribution purposes. In cases such as this, how should the part be tracked? As well, in a situation such as this, would a package lot be required?

CDER issue only: Refer to the CDER LDD group.

13. When there is only a packaging code for a multi-layer package on the outermost package, which packaging information should be used in the Final Container Details section - only the innermost package coding or the outermost package?

Michael Fauntleroy: This should be vetted when the product office.

14. How do we proceed in situations where the product is old and the UNII codes for the ingredients are not present in the database – Those ingredients will give errors, how do we submit LOT Data for NDCs with these missing UNII code ingredients?

Michael Fauntleroy: The product should already be drug listed. LDD should include the same information.

This specific case is for an old product that hasn't been listed with FDA. Seasonal product, regulated by CBER, with different formulation each year. It isn't being distributed, but it is still being returned. Michael requested that the sponsor send in more details so that this can be handled in the future.

15. When validating Lot Distribution files that were created based on older product listing SPL files, we have occasionally received validation errors with respect to changed moiety and ingredient relationship. How do we address these validation errors?

Michael Fauntleroy/Lonnie Smith: Go back to the original information and correct.

16. When would the “Anticipated” Distribution type be used within an LDR? Can you describe some situations where this type would be applicable?

Michael Fauntleroy/Lonnie Smith: This was removed from the web page.

17. Due to a merger/acquisition, the labeler code for a certain product can change as can the NDC code. In this case a new LDR SPL will be created with a new set ID. How should we indicate that the old LDR SPL with the older Labeler code needs to be archived?

Michael Fauntleroy/Lonnie Smith: All submissions are archived. Therefore no further archive is needed.

Send the Core ID for the submission that threw the error. They can research the situation.

Sanofi

18. Please indicate when the updated SPL IG with Validation Procedures covering the creation and submission of eLDD files will be made available.

Lonnie: The IG has already been published on the SPL Resources page – that includes the procedures for LDR. Usually updated every couple of months.

Next update will be available when they receive clearance on one of the revised sections.

19. Please provide a comprehensive list of the most common issues found to-date in eLDD submissions and clarify how to correct for them.

Michael:

- Biggest error (98%) is that people misnamed the file. XML file should use “docid.xml.” Most companies use company names, etc.
- Putting the wrong NDC numbers in the file.

20. Please clarify the process for submitting eLDD at both CBER and CDER - including specifics of:
- which web trader submission type to use for each center;
 - how to position the eLDD within the eCTD folder structure and what to call the folder for each center; and,
 - how the submitted files are processed and validated including what ACKnowledgements sponsors should expect for both successful and unsuccessfully processed eLDDs for each center and the general content of these ACKnowledgements?

Michael Fauntleroy/Lonnie Smith: See notes above. Validation uses standard process.

Bill Frigle: Should there be an SPL subfolder under 3.2.r. ... or should it go directly in 3.2.r. It should go directly in 3.2.4 with no subfolder.

21. Please clarify if the SPL eLDD xml can be included with a BLA Annual Report or if it must be a stand-alone submission?

Michael Fauntleroy: This is a standalone submission – product correspondence. It should not go into an annual report.

22. Please describe how the Agency would like sponsors to report periods with zero product distribution (e.g., is it acceptable to submit a Cover Letter explaining that there was zero product distribution and a 356h Form with no SPL)?

Michael Fauntleroy: Use the same format as what was used in the past. If this worked in the past, do it the same way.

23. Please describe how the agency would like distribution data reported for kits with inner containers that haven't been drug listed?

Michael: This should already been addressed when product was approved.

24. For returns data, please clarify if there is a "cut-off" under which the reporting of returns data is not required (21 CFR 600.81 only requires *significant amounts* returned to be reported)?

Michael: Product office question.

25. Please clarify how to report returns data for kits when there are partial returns of inner containers that haven't been drug listed?

Michael: This is a product question.

26. We've been told that instructions will be provided in a eBook. Should we wait until the eBook is published, or submit now.

Michael/Herb: If you have a submission responsibility, you should meet that obligation.